

As an independent owner-operator leased to an irregular route motor carrier, I would be in favor of leaving the current regulations as is. They seem to be working well and further change seems unnecessary and would create confusion. I have rested more and have still maintained productivity as compared with the old regulations.

F-3-5: I would request that the split sleeper berth provision be maintained as is in any future rulemaking. The day of an irregular route driver is constructed in such a way that it would be difficult to meet the 14 hour requirement without splitting sleeper berth time. Also, short rest periods improve driver alertness when needed most, which is not necessarily when regulations mandated the rest period.

F-4: I am totally against the potential requirement of use of mandatory EOBR's. They would be an unreasonable intrusion of personal privacy and would have an unreasonably high cost of implementation, especially for individual truck owners. Most importantly, I believe a further number of experienced drivers would give up and leave the industry and it would be harder to recruit good new driving talent, in an industry that is already experiencing a severe shortage - this would negatively affect safety and productivity and our economy as a whole. Thank you.